

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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Target Corporation, et al.,

Plaintiffs,

-v-

Index No. 13-cv-3477(AKH)

Visa, Inc. et al.,

Defendants,

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**NOTICE AND [PROPOSED] ORDER FOR WITHDRAWAL OF COUNSEL**

PLEASE TAKE NOTICE that, upon the annexed declaration of Nicole Gueron and subject to the approval of the Court, Nicole Gueron hereby withdraws as counsel for plaintiffs Target Corporation, Target Commercial Interiors, Inc.; TCC Cooking Co.; Macy's, Inc.; Macy's Retail Holdings, Inc.; Macy's West Stores Inc.; Macy's Florida Stores, LLC; Macy's Puerto Rico, Inc.; Macys.com, Inc.; Bloomingdales, Inc.; Bloomingdale's By Mail, Ltd.; Bloomingdale's The Outlet Store, Inc.; The TJX Companies, Inc.; Concord Buying Group Inc.; Marshalls of MA, Inc.; Marshalls of Matteson, IL., Inc.; Marshalls of Richfield, MN., Inc.; Marshalls of Calumet City, IL., Inc.; Marshalls of Beacon, VA., Inc.; Marmaxx Operating Corp.; HomeGoods, Inc.; Marshalls of Laredo, TX., Inc.; Marshalls of Chicago-Clark, IL., Inc.; Marshalls of CA, LLC; Marshalls of IL, LLC; T.J. Maxx of CA, LLC; T.J. Maxx of IL, LLC; Marshalls of Elizabeth, NJ, Inc.; Marshalls of Glen Burnie, MD., Inc.; Newton Buying Company of CA, Inc.; TJX Incentive Sales, Inc.; Derailed, LLC; New York Department Stores De Puerto Rico, Inc.; Sierra Trading Post, Inc.; Kohl's Corporation; Kohl's Department Stores, Inc.; Kohl's Value Services, Inc.; Kohl's Illinois, Inc.; Kohl's Michigan, L.P.; Kohl's Indiana L.P.; Staples, Inc.; Staples the Office Superstore East, Inc.; Staples the Office Superstore, LLC; Staples Contract & Commercial, Inc.; Quill Corporation; Quill Lincolnshire, Inc.; Medical Arts Press,

Inc.; SmileMakers, Inc.; Thrive Networks, Inc.; SchoolKidz.com, LLC; J.C. Penney Corporation, Inc.; Office Depot, Inc.; Viking Office Products, Inc.; 4sure.com, Inc.; Computers4sure.com, Inc.; Solutions4sure.com, Inc.; L Brands, Inc. f/k/a Limited Brands, Inc.; Henri Bendel, Inc.; Victoria's Secret Stores, LLC; Victoria's Secret Stores Puerto Rico, LLC; Bath & Body Works LLC; Limited Brands Direct Fulfillment, Inc. d/b/a Victoria's Secret Direct; Bath & Body Works Direct, Inc.; OfficeMax Incorporated; OfficeMax North America, Inc.; BizMart, Inc.; BizMart (Texas), Inc.; Big Lots Stores, Inc.; C.S. Ross Company; Closeout Distribution, Inc.; PNS Stores, Inc.; Abercrombie & Fitch Co.; Abercrombie & Fitch Stores, Inc.; J.M. Hollister, LLC; RUEHL No. 925, LLC; Gilly Hicks LLC; Ascena Retail Group, Inc.; The Dress Barn, Inc.; Maurices Incorporated; Tween Brands, Inc.; Tween Brands Direct, LLC; Charming Direct, Inc.; Figi's, Inc.; Catherine's of California, Inc.; Catherine's of Pennsylvania, Inc.; Catherines Partners – Indiana, L.L.P.; Catherines Partners – Washington, G.P.; Catherines Stores Corporation; Catherines Woman Michigan, Inc.; Catherines, Inc.; Charming Shoppes Outlet Stores, LLC; Lane Bryant, Inc.; Catherines of Nevada, Inc.; Catherines Partners-Texas, L.P.; Catherines Woman Delaware, Inc.; Outlet Division Store Co. Inc.; Saks Incorporated; Saks & Company; Saks Fifth Avenue Texas, LLC; Saks Fifth Avenue, Inc.; SCCA Store Holdings, Inc.; Saks Direct, LLC; Club Libby Lu, Inc.; The Bon-Ton Stores, Inc.; The Bon-Ton Department Stores, Inc.; McRIL, LLC; Carson Pirie Scott II, Inc.; Bon-Ton Distribution, Inc.; The Bon-Ton Stores of Lancaster, Inc.; Chico's FAS, Inc.; White House|Black Market, Inc.; Soma Intimates, LLC; Boston Proper, Inc.; Luxottica U.S. Holdings Corp.; Luxottica USA LLC; Luxottica Retail North America Inc.; Rays Houston; LensCrafters International, Inc.; Air Sun; EYEXAM of California, Inc.; Sunglass Hut Trading, LLC; Pearle VisionCare Inc.; The Optical Shop of Aspen; MY-OP (NY) LLC; Lunettes, Inc.; Lunettes California, Inc.; Oliver Peoples, Inc.; Oakley, Inc.; Oakley

Sales Corp.; Oakley Air; Eye Safety Systems, Inc.; Cole Vision Services, Inc.; EyeMed Vision Care LLC; Luxottica North America Distribution LLC; American Signature, Inc.; and The Door Store, LLC (jointly, “Target Plaintiffs”) and shall be removed from the Case Management/Electronic Case Files (CM/ECF) notification list in the above-captioned matter. Gibbs and Bruns LLP and Vorys, Sater, Seymour and Pease LLP will continue to serve as counsel of record for Target Plaintiffs in this proceeding.

Dated: August 2, 2024  
New York, New York

CLARICK GUERON REISBAUM LLP

By: /s/Nicole Gueron  
Nicole Gueron  
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New York, NY 10001  
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SO ORDERED:

/S/ Alvin K. Hellerstein  
Hon. Alvin K. Hellerstein U.S.D.J.  
**Date:** August 7, 2024

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SOUTHERN DISTRICT OF NEW YORK**

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**DECLARATION OF NICOLE GUERON**

1. I am an attorney at the law firm Clarick Gueron Reisbaum LLP, counsel for the Target Plaintiffs in the above-captioned matter. I submit this declaration in compliance with Local Rule 1.4 to notify the Court that I am withdrawing as counsel of record for Target Plaintiffs.

2. Gibbs and Bruns LLP and Vorys, Sater, Seymour and Pease LLP will continue to serve as counsel of record for Target Plaintiffs in this matter.

3. My withdrawal will not delay the matter or prejudice any party, and I am not retaining or charging a lien.

4. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 2, 2024  
New York, New York

/s/Nicole Gueron  
Nicole Gueron